

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
MINING PROJECT WIND DOWN HOLDINGS, INC. (f/k/a Compute North Holdings, Inc.), <i>et al.</i> ,	§	Case No. 22-90273 (MI)
	§	
Reorganized Debtors.	§	(Jointly Administered)
	§	
	§	
TRIBOLET ADVISORS LLC, in its capacity as Plan Administrator and Trustee for the Mining Project Wind Down Holdings, Inc. Litigation Trust,	§	Adv. Pro. No. 23-03210
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
CORPUS CHRISTI ENERGY PARK, LLC and BOOTSTRAP ENERGY, LLC,	§	
	§	
Defendants.	§	
	§	

AGREED AMENDED DISCOVERY CONTROL PLAN & SCHEDULING ORDER

Under authority of Fed. R. Bankr. P. 7016 and Fed. R. Civ. P. 16, it is hereby
ORDERED that the Stipulated and Agreed Scheduling Order entered on May 21, 2024 [Dkt. 33]
is hereby amended as explicitly stated herein, and the following deadlines and settings shall
apply in the above referenced adversary:

1. The party with the burden of proof on an issue must serve its expert reports no later than **December 2, 2024**. Rebuttal expert reports must be served no later than **January 2, 2025**.
2. All discovery in this case must be completed on or before **January 31, 2025**.

3. Dispositive motions may not be filed after **February 17, 2025**. Any responses to dispositive motions must be filed within 20 days after a dispositive motion is filed. The Court additionally orders:

A. Courtesy copies of dispositive motions and responses must be mailed or delivered to the Court's chambers when they are filed with the Clerk.

B. Dispositive motions may not be filed until discovery is completed.

4. Witness and Exhibit Lists must be exchanged at least 2 business days prior to the face-to-face meeting required in the following paragraph. Copies of the exhibits shall be attached to the Exhibit List.

5. Counsel must meet face to face to attempt to resolve these issues amicably, to attempt to stipulate to as many facts and issues as possible, and to prepare the pretrial order. This face-to-face meeting must occur prior to **April 10, 2025**. The court intends that this will be a substantive, good faith effort to resolve issues. Therefore, trial counsel (lead counsel) are required to attend this meeting in person. Counsel who are not present at this meeting may not be permitted to participate in the trial.

6. The parties must jointly prepare and file a proposed form of pretrial statement not later than **April 18, 2025**. The proposed form of statement must be signed by counsel for both parties and must be in the form set forth as Appendix C on the Court's website.

7. Copies of exhibits must be attached to the pretrial statement. Relevant portions of lengthy exhibits must be highlighted. Counsel must also attach succinct memoranda on disputed issues of law. A courtesy copy of the pretrial order must be delivered to chambers when the pretrial order is filed with the clerk.

8. A Pre-Trial Conference will:

A. _____ Not be held.

B. X Be held on _____ at _____. Attendance by all parties is required, either in proper person (if not represented by counsel) or by an attorney who has authority to bind the party. Each party must have a representative present with full settlement authority.

9. Trial of this adversary proceeding will commence on **May 19, 2025, at 10:30 a.m.** It is estimated that trial can be completed in 16 hours of trial time.

IT IS FURTHER:

ORDERED that changes to this Scheduling Order may only be made by further order of this Court, if necessary, or by agreement of all parties hereto in writing. A motion to extend any deadline and/or alter any hearing date will only be granted for good cause shown beyond the control of the lawyers and/or parties and only in very limited circumstances.

SIGNED:

UNITED STATES BANKRUPTCY JUDGE

Stipulated and Agreed:

/s/ Debbie E. Green - signed with permission

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